

MARK J. BENNETT 2672
Attorney General of Hawai'i

JAMES E. HALVORSON 5457
NELSON Y. NABETA 3004
Deputy Attorneys General
Department of the Attorney
General, State of Hawai'i
235 S. Beretania Street, 15th Floor
Honolulu, Hawai'i 96813
Telephone: (808) 587-2900
Facsimile: (808) 587-2965
E-Mail: Nelson.Y.Nabeta@hawaii.gov

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

ROBERT SHEREZ,

Plaintiff,
vs.

STATE OF HAWAII, DEPARTMENT
OF EDUCATION; PATRICIA
HAMAMOTO, Superintendent of
Hawai'i Schools; MEREDITH
MAEDA, Principal, Castle High
School; SARA GRONNER or
GRONNA, Vice Principal of Castle
High School,

Defendants.

Civil No. 04-00390 JMS/KSC

DEFENDANTS MEREDITH MAEDA
AND SARAH GRONNA'S MOTION
IN LIMINE FOR ORDER
PROHIBITING PLAINTIFF FROM
INTRODUCING EVIDENCE THAT
DEFENDANTS INTENTIONALLY
VIOLATED HIS RIGHTS;
MEMORANDUM IN SUPPORT OF
MOTION; CERTIFICATE OF
SERVICE

Trial: March 28, 2007
Judge: The Honorable
J. MICHAEL SEABRIGHT

DEFENDANTS MEREDITH MAEDA AND SARAH GRONNA'S
MOTION IN LIMINE FOR ORDER PROHIBITING PLAINTIFF
FROM INTRODUCING EVIDENCE THAT DEFENDANTS
INTENTIONALLY VIOLATED HIS RIGHTS

COMES NOW, Defendants MEREDITH MAEDA and SARAH GRONNA, in their individual capacities (hereinafter referred to collectively as Defendants), by and through their attorneys, Mark J. Bennett, Attorney General, and James E. Halvorson and Nelson Y. Nabeta, Deputy Attorneys General, hereby moves this Court for an order prohibiting Plaintiff from introducing evidence that Defendants, for purposes of his claim under 42 U.S.C. §1983, intentionally violated his rights when they enforced an official departmental policy.

This motion is made pursuant to the Court's Second Amended Rule 16 Scheduling Order filed on February 22, 2007, Rule 7 of the Federal Rules of Civil Procedure, and Rules 7.1 and 16.9 of the Local Rules of Practice for the United States District Court for the District of Hawai'i, and is based upon the accompanying supportive memorandum and the records and files herein.

DATED: Honolulu, Hawai'i, March 7, 2007.

/s/ NELSON Y. NABETA
NELSON Y. NABETA
Deputy Attorney General

Attorney for Defendants